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August 4, 2005

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Honorable Theodore H. Katz United States Magistrate Judge Southern District of New York 500 Pearl Street New York, New York 10007

USDC SDNY DUCUMENT **ELECTRONICALLY FILED** DOC #: DATE FILED:

Vaicaitiene v. Partners In Carc, Inc. and Visiting

Nurse Service of New York, Inc., 04 Civ. 9125 (RMB)(THK)

Dear Judge Katz:

We are the attorneys for defendants in the above-referenced proceeding. By Memorandum Opinion and Order dated July 6, 2005, Your Honor directed defendants to furnish to plaintiff names and addresses of the class of potential plaintiffs within 30 days of said Order.

We are writing to request a one-week extension of the 30-day deadline, which falls on Friday, August 5. This is defendants' first request for an extension. As I have explained to plaintiff's counsel, while we believe our initial estimate of between 8,000 and 9,000 names remains accurate, it has proven difficult and time-consuming to identify and remove duplicate entries and to identify the most recent address known to defendants where more than one address is available. The additional week is necessary to enable us to produce a list that to the extent possible will provide a single entry for each home health aide employee and the most recent address available in defendants' records. Plaintiff's counsel has consented to the requested extension.

Accordingly, we respectfully request that the Court extend defendants' time to provide the required listing of names and addresses to August 12, 2005.

Respectfully,

Kathy II. Chin

Karl J. Stoecker, Esq. cc: Attorney for Plaintiff

(via facsimile)

The request is granted.

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The request is granted.

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